

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

JERRY LEON DEES, JR.,

Plaintiff,

V.

**HYUNDAI MOTOR MANUFACTURING
ALABAMA, LLC, and HYUNDAI MOTOR
AMERICA, INC.,**

Defendants.

**CIVIL ACTION NO.:
2:07-cv-00306-MHT-CSC**

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S TRIAL WITNESSES

Defendants Hyundai Motor Manufacturing Alabama, LLC (“HMMA”) and Hyundai Motor America, Inc. (“HMA”) (collectively “Defendants”) file these objections to Plaintiff’s Trial Witness List. (Doc. 122).

<u>Ex. No.</u>	<u>Plaintiff's Witness Listed</u>	<u>Objection(s)</u>
(I)(11).	Ronnie House	Not previously disclosed or otherwise identified by Plaintiff; unfair surprise. ¹
(II)(13).	Richard E. Neal, Esq.	Attorney-client privilege: F.R.E. 501; Relevance/Prejudicial/Confusion of Issues: F.R.E. 401-03
(II)(19).	Christopher N. Smith, Esq.	Attorney-client privilege: F.R.E. 501; Relevance/Prejudicial/Confusion of Issues: F.R.E. 401-03

Defendants reserve the right to offer further objections at trial if any of the above challenged witnesses are called to testify.

¹ See Exh. 1, March 21, 2008 e-mail correspondence from Defendants' counsel to Plaintiff's counsel, attached hereto. Defendants' counsel has requested information from Plaintiff's counsel regarding the anticipated testimony of Mr. House but, to date, has received no response.

Respectfully submitted this 31st day of March, 2008.

/s/ J. Trent Scofield

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Attorneys for Defendants Hyundai Motor
Manufacturing Alabama, LLC and
Hyundai Motor America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of March, 2008, I electronically filed the foregoing *Defendants' Objections to Plaintiff's Trial Witnesses* with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: W. Perry Hall, Vincent F. Kilborn, III, David Allen McDonald, Jeffrey Rayborn Sport, Timothy A. Palmer, T. Scott Kelly, and Matthew K. Johnson.

/s/ J. Trent Scofield
Of Counsel

Jerry Dees v. HMMA and HMA
2:07-cv-00306-MHT-CSC

EXHIBIT 1

**Defendants' Objections to Plaintiff's
Trial Witnesses**

Scofield, J. Trent

From: Scofield, J. Trent
Sent: Friday, March 21, 2008 11:47 AM
To: 'Jeffrey Sport'
Subject: RE: Dees v. HMMA: Correspondence

Jeff:

Please advise if you are going to supplement initial disclosures, as referenced in your email below. I am particularly interested in Ronnie House, an individual listed on Plaintiff's witness list but not previously disclosed. Please let reply at your earliest convenience.

Thanks -- Trent

-----Original Message-----

From: Jeffrey Sport [mailto:jeff.sport@sportlaw.us]
Sent: Thursday, March 06, 2008 10:17 AM
To: Scofield, J. Trent
Subject: Re: Dees v. HMMA: Correspondence

Trent,

Thanks. I will also supplement our initial disclosures out of an abundance of caution.

Please let me know when you are going to produce the new materials listed in your supplemental initial disclosures. I need to review them before I can properly decide upon objections, due next Wednesday.

Please overnight them to me. I will be happy to provide our FedEx number if necessary.

--Jeff

----- Original Message -----

From: Scofield, J. Trent
To: Jeffrey Sport
Sent: Wednesday, March 05, 2008 6:26 PM
Subject: Dees v. HMMA: Correspondence

Jeff:

The attached pdf document contains:

1. My cover correspondence to you,
2. Defendants' Witness List,
3. Defendants' Exhibit List, and
4. Defendants' Third Supplemented Initial Disclosures.

The contents should be self-explanatory. However, should you have any questions, please feel free to call me.

Trent

-----Original Message-----

From: Sharescan

3/30/2008